

November 25, 2002

**RE: ELSA, LLC 095-16128-00048**

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## **Notice of Decision - Approval**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

November 25, 2002

Mr. Erl Haapanen  
ELSA, LLC  
1240 South SR 37  
Elwood, Indiana 46036

Re: 095-15742-00048  
First Administrative Amendment to  
Part 70 095-7668-00048

Dear Mr. Haapanen:

ELSA, LLC was issued a permit on April 20, 1998 for an automobile fuel tank and exhaust systems manufacturing plant. A letter requesting to add a paint burn-off oven was received on September 17, 2002.

Based on stack test data provided by ELSA, LLC, the PM, PM10, SO2, NOx, VOC, and CO unrestricted potential to emit (UPTE) are estimated to be 0.04, 0.04, 0.04, 0.53, 0.09, and 0.04 tons/yr, respectively. The single and combined HAP UPTE each are determined to be negligible. Therefore, the proposed burn-off oven qualifies as an insignificant activity under 326 IAC 2-7-1(21).

The proposed burn-off oven does have a new applicable requirement (326 IAC 4-2) which keeps the proposed modification from being incorporated into the permit via an administrative amendment. However, the Office of Air Quality has determined that modifications that qualify as an insignificant activity can be incorporated into the Part 70 Permit via an administrative amendment pursuant to 326 IAC 2-7-11.

Therefore, the proposed burn-off oven shall be incorporated into the Part 70 permit, as follows, via an Administrative Amendment pursuant to 326 IAC 2-7-11.

(1) Condition A.3:

Condition A.3 has been revised as follows to add the burn-off oven to the regulated insignificant activities list.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)], [326 IAC 2-7-4(c)], and  
[326 IAC 2-7-5(15)]

This stationary source.....

(12) One (1) paint burn-off oven.

(2) Section D.4:

A new section D.4 has been added to include the burn-off oven applicable requirements.

#### **Section D.4 FACILITY OPERATION CONDITIONS**

##### **Facility Description [326 IAC 2-7-5(15)]:**

**One (1) paint burn-off oven.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

##### **D.4.1 Incinerator Requirements [326 IAC 4-2]**

Pursuant to 326 IAC 4-2 (Burning Regulations for Incinerators), the rotary kiln incinerator shall:

- (1) consist of primary and secondary chambers or the equivalent,
- (2) be equipped with a primary burner unless burning wood products,
- (3) comply with 326 IAC 5-1 and 326 IAC 2,
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner,
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner,
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators,
- (7) be operated so that emissions of hazardous material including, but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented,
- (8) be limited as follows:
  - (A) the PM emissions from the burn-off oven shall not exceed three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is two hundred (200) pounds per hour or more, or
  - (B) the PM emissions from the burn-off oven shall not exceed five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is less than two hundred (200) pounds per hour;

and

- (9) not create a nuisance or a fire hazard.

**If any of the above result, the burning shall be terminated immediately.**

- (3) Changes to the Table of Contents:

The Table of Contents has been revised to include the new Section D.4 requirements.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - Madison County  
U.S. EPA, Region V  
Madison County Health Department  
Air Compliance Section Inspector - Don Knotts  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**ELSA, LLC.  
1240 South SR 37  
Elwood, Indiana 46036**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 095-7668-00048	Date Issued: April 17, 1998
First Administrative Amendment No.: T 095-15742-00048	Date Issued: July 26, 2002
Second Administrative Amendment No.: T 095-16128-00048	Affected Pages: 4 and 7, with 44a added
Issued by: Original Signed by Paul Dubenetzky  Paul Dubenetzky, Branch Chief Office of Air Quality	Issued: November 25, 2002

**D.3 FACILITY OPERATION CONDITIONS - Welding Operations**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Particulate Matter (PM) [326 IAC 6-3-1]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.3.3 Testing Requirements [326 IAC 2-7-6(1)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.3.4 Record Keeping Requirements

**D.4 FACILITY OPERATION CONDITION - Burn-Off Oven**

D.4.1 Incinerator Requirements [326 IAC 4-2]

**Certification Form**

**Emergency/Deviation Occurrence Report**

**Quarterly Compliance Report**

04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-2-3, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU-33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.

- (xiii) Twenty-one (21) metal inert gas (MIG) welders, identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BG-06, BG-07, BG-09, BG-10, BG-12, BG-16, BP-01, BP-02, BP-03, BP-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-1(3.8 MMBtu/hr) and exhausting to stack 10.
- (2) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-2(3.8 MMBtu/hr) and exhausting to stack 11.
- (3) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Rec-3(3.8 MMBtu/hr) and exhausting to stack 13.
- (4) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as dry-off, bake oven (4.5 MMBtu/hr) and exhausting to stacks 18 and 19.
- (5) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer B (1.75 MMBtu/hr) and exhausting to stacks 20 and 21.
- (6) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer C (1.75 MMBtu/hr) and exhausting to stacks 22 and 23.
- (7) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as J washer (1.00 MMBtu/hr) and exhausting to stack 30.
- (8) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Ford washer (2.5 MMBtu/hr) and exhausting to stacks 31 and 32.
- (9) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as wax bake oven (2.75 MMBtu/hr) and exhausting to stack 36.
- (10) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (0.74 MMBtu/hr) and exhausting to stack 45.
- (11) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (1.00 MMBtu/hr) and exhausting to stack 47.
- (12) One (1) paint burn-off oven.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (applicability)

## Section D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) paint burn-off oven.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### D.4.1 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2 (Burning Regulations for Incinerators), the rotary kiln incinerator shall:

- (1) consist of primary and secondary chambers or the equivalent,
- (2) be equipped with a primary burner unless burning wood products,
- (3) comply with 326 IAC 5-1 and 326 IAC 2,
- (4) be maintained properly as specified by the manufacturer and approved by the Commissioner,
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner,
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators,
- (7) be operated so that emissions of hazardous material including, but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented,
- (8) be limited as follows:
  - (A) the PM emissions from the burn-off oven shall not exceed three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is two hundred (200) pounds per hour or more, or
  - (B) the PM emissions from the burn-off oven shall not exceed five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is less than two hundred (200) pounds per hour;

and

- (9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.



**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD)  
for  
an Administrative Amendment to an Existing Part 70 Permit

**Source Background and Description**

Source Name:	ELSA, LLC.
Source Location:	1240 South SR 37, Elwood, IN 46036
County:	Madison
SIC Code:	3714
Part 70 Permit No.:	095-7668-00048
Date Issued:	April 17, 1998
Administrative Amendment No.:	095-16128-00048
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from ELSA, LLC., relating to the operation of their existing fuel tanks and exhaust systems manufacturing operation.

**Request**

On September 17, 2002, ELSA, LLC. submitted a request to add a paint burn-off oven.

The addition of the proposed burn-off oven will not cause any increases in production or emissions from the existing units.

Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed burn-off oven itself.

Based on stack test data provided by ELSA, LLC, the PM, PM10, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO unrestricted potential to emit (UPTE) are estimated to be 0.04, 0.04, 0.04, 0.53, 0.09, and 0.04 tons/yr, respectively. The single and combined HAP UPTE each are determined to be negligible. Therefore, the proposed burn-off oven qualifies as an insignificant activity under 326 IAC 2-7-1(21).

The proposed burn-off oven does have a new applicable requirement (326 IAC 4-2) which keeps the proposed modification from being incorporated into the permit via an administrative amendment. However, the Office of Air Quality has determined that modifications that qualify as an insignificant activity can be incorporated into the Part 70 Permit via an administrative amendment pursuant to 326 IAC 2-7-11.

Therefore, the proposed burn-off oven shall be incorporated into the Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11.

**Existing Approvals**

The source has been operating under Part 70 Permit 095-7668-00048, issued on April 17, 1998 and First Administrative Amendment 095-15742-00048, issued on July 26, 2002.

## **Enforcement Issue**

There are no enforcement actions pending.

## **Recommendation**

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

## **Emission Calculations**

The emissions generated by the proposed burn-off oven PM, PM10, SO2, NOx, VOC, CO, and HAP emissions.

### **(1) Unrestricted Potential to Emit (UPTE):**

The following calculations determine the UPTE due to the proposed burn-off oven.

#### **(1) PM/PM10:**

The following calculations determine the PM emissions from the burn-off oven based on lb/hr emission rates based on stack test data using the worst case production rate, 8760 hours of operation, and emissions before controls.

$$0.01 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton PM/lb PM} = \mathbf{0.04 \text{ tons PM/yr}^*}$$

\* PM is determined to be equal to PM10 in this case.

#### **(2) SO2:**

The following calculations determine the SO2 emissions from the burn-off oven based on lb/hr emission rates based on stack test data using the worst case production rate, 8760 hours of operation, and emissions before controls.

$$0.01 \text{ lb SO2/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton SO2/lb SO2} = \mathbf{0.04 \text{ tons SO2/yr}}$$

#### **(3) NOx:**

The following calculations determine the NOx emissions from the burn-off oven based on lb/hr emission rates based on stack test data using the worst case production rate, 8760 hours of operation, and emissions before controls.

$$0.12 \text{ lb NOx/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton NOx/lb NOx} = \mathbf{0.53 \text{ tons NOx/yr}}$$

#### **(4) VOC:**

The following calculations determine the VOC emissions from the burn-off oven based on lb/hr emission rates based on stack test data using the worst case production rate, 8760 hours of operation, and emissions before controls.

$$0.02 \text{ lb VOC/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton VOC/lb VOC} = \mathbf{0.09 \text{ tons VOC/yr}}$$

**(5) CO:**

The following calculations determine the CO emissions from the burn-off oven based on lb/hr emission rates based on stack test data using the worst case production rate, 8760 hours of operation, and emissions before controls.

$$0.01 \text{ lb CO/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton CO/lb CO} = \mathbf{0.04 \text{ tons CO/yr}}$$

**(6) HAPs:**

The worst case single and combined HAP UPTE are determined to be negligible.

**Emissions After Controls:**

All applicable emissions are uncontrolled.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.04
PM-10	0.04
SO <sub>2</sub>	0.04
VOC	0.09
CO	0.04
NO <sub>x</sub>	0.53

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	neg.
Combined HAPs	neg.

The proposed burn-off oven does have a new applicable requirement (326 IAC 4-2) which keeps the proposed modification from being incorporated into the permit via an administrative amendment. However, the Office of Air Quality has determined that modifications that qualify as an insignificant activity can be incorporated into the Part 70 Permit via an administrative amendment pursuant to 326 IAC 2-7-11.

Therefore, the proposed burn-off oven shall be incorporated into the Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11.

### County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Madison County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of Part 70 Permit 095-7668-00048, issued on July 26, 2002:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>250	>250	<100	<100	>250	<100	>10	>25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This source is a major PSD stationary source because the PM, PM10, and VOC emissions each are emitted at a rate of 250 tons per year or more.
- (b) This source is a Title V major stationary source because the PM, PM10, and VOC emissions exceed the applicable level of 100 tons per year, the worst case single HAP emissions exceed the applicable level of 10 tons per year, and the combined HAP emissions exceed 25 tons per year.

## Modification Emissions

Emissions due to the modification based on the emissions after controls and 8760 hours of operation per year at rated capacity, and after implementation of any applicable limits or standards:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Modification	0.04	0.04	0.04	0.53	0.09	0.04	neg.	neg.

PSD Significant Levels	25	15	40	40	40	100	-	-
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This modification is not a major PSD modification because none of the regulated pollutant emissions are less than their respective significant levels.

## Emissions After the Modification

Source emissions after the modification based on the emissions after controls, 8760 hours of operation per year at rated capacity, and after implementation of any applicable limits or standards:

The following table lists the source emissions after the modification based on emissions after controls, after establishment of a VOC emission limit required to avoid the Part 70 requirements.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source After the Modification	>250	>250	<100	<100	>250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This source after the modification is still a major PSD stationary source because the PM, PM10, and VOC emissions each are still emitted at a rate of 250 tons per year or more.
- (b) This source after the modification is still a Title V major stationary source because the PM, PM10, and VOC emissions exceed the applicable level of 100 tons per year, the worst case single HAP emissions exceed the applicable level of 10 tons per year, and the combined HAP emissions exceed 25 tons per year.

## Federal Rule Applicability

### (a) New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed burn-off oven.

**(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):**

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Parts 61 and 63) that apply to the proposed burn-off oven.

**State Rule Applicability**

**(a) Entire State Rule Applicability:**

**(1) 326 IAC 1-6-3 (Preventive Maintenance Plan):**

The proposed source is still required to have a preventive maintenance plan for the emission units and control devices of the source.

**(2) 326 IAC 2-6 (Emission Reporting):**

This source is still subject to 326 IAC 2-6 (Emission Reporting), because the source VOC PTE after the proposed modification is still greater than the applicable level of 100 tons per year.

**(4) 326 IAC 5-1-2 (Opacity Limitations):**

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

**(b) Individual Unit Rules:**

**(1) 326 IAC 4-2:**

326 IAC 4-2 applies because the incinerator is not one of the exempted units listed in 326 IAC 4-2.

Pursuant to 326 IAC 4-2 (Burning Regulations for Incinerators), the rotary kiln incinerator shall:

- (1) consist of primary and secondary chambers or the equivalent,
- (2) be equipped with a primary burner unless burning wood products,
- (3) comply with 326 IAC 5-1 and 326 IAC 2,
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner,
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner,
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators,
- (7) be operated so that emissions of hazardous material including, but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented,
- (8) be limited as follows:
  - (A) the PM emissions from the burn-off oven shall not exceed three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is two hundred (200) pounds per hour or more, or

- (B) the PM emissions from the burn-off oven shall not exceed five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is less than two hundred (200) pounds per hour;

and

- (9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

The PM loading provided by the manufacturer is 1.32 E-6 pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air which is less than the 326 IAC 4-2 limits of limit of 0.3 and 0.5 pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

Thus, compliance is determined to be achieved.

**(2) 326 IAC 6:**

Pursuant to 326 IAC 6-3-1(b)(2), incinerators are exempt from the requirements of 326 IAC 6.

The burn-off oven is determined to be an incinerator for the purposes of 326 IAC 4. Therefore, 326 IAC 6 does not apply.

**(3) 326 IAC 8:**

Although there are no other Article 8 rules that apply to the proposed burn-off oven, the requirements of 326 IAC 8-1-6 do not apply because the potential emissions are less than the applicable level of 25 tons per year.

**Changes to the Permit**

The following lists the changes to the existing permit that are necessary to incorporate the proposed burn-off oven into the permit. All language removed from the permit is struck-out and all added information is indicated in bold type.

**(1) Condition A.3:**

Condition A.3 shall be revised as follows to add the burn-off oven to the regulated insignificant activities list.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)], [326 IAC 2-7-4(c)], and [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

.....

- (12) One (1) paint burn-off oven.

**(2) Section D.4:**

A new section D.4 shall be added to include the burn-off oven applicable requirements.

**Section D.4 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

One (1) paint burn-off oven.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**D.4.1 Incinerator Requirements [326 IAC 4-2]**

Pursuant to 326 IAC 4-2 (Burning Regulations for Incinerators), the rotary kiln incinerator shall:

- (1) consist of primary and secondary chambers or the equivalent,
- (2) be equipped with a primary burner unless burning wood products,
- (3) comply with 326 IAC 5-1 and 326 IAC 2,
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner,
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner,
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators,
- (7) be operated so that emissions of hazardous material including, but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented,
- (8) be limited as follows:
  - (A) the PM emissions from the burn-off oven shall not exceed three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is two hundred (200) pounds per hour or more, or
  - (B) the PM emissions from the burn-off oven shall not exceed five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, if the maximum burning capacity is less than two hundred (200) pounds per hour;

and

- (9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

**(3) Changes to the Table of Contents:**

The Table of Contents shall be revised to include the new Section D.4 requirements.



## **Conclusion**

The proposed oven shall be operated according to the provisions of proposed Administrative Amendment 095-16128-00048 and all other applicable requirements of the other existing source approvals.